



## **INJURY AND ILLNESS PREVENTION PROGRAM**

**ESTABLISHING A SAFE WORKPLACE**



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## INJURY AND ILLNESS PREVENTION PROGRAM

### ESTABLISHING A SAFE WORKPLACE

We at Luttrell Staffing Group believe in maintaining a safe workplace. Our experience with workplace safety and health has been positive and contributes to our productivity and culture. We are committed to leading and supporting safety performance.

This program has been adopted to establish and maintain a safer workplace. Everyone is expected to read it, understand it, and follow safe work practices during the performance of daily assignments. A copy of this IIPP will be available to all employees through the Human Resources Department. Further information can be obtained from the IIPP administrator of the Human Resources Department.

I want everyone to participate and help us maintain a safer workplace. Clients/Supervisors and experienced employees should work closely together to help our new employees recognize and respond appropriately to work-related hazards. Everyone will attend safety training sessions and use their knowledge and experience to protect each other and ultimately the happiness of our families.

This program is the foundation of our Safety Management System and reflects my commitment to providing leadership and continuous improvement. For these reasons, maintaining a safe workplace starts with a daily assessment, and crew meetings to focus on safe work practices. Learn how the system works to identify and prevent hazards and communicates our safety expectations.

If there are any questions about the Program, please ask your Luttrell Staffing Group Manager.

  
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Marty Luttrell, Co-Owner

6.25.2022  
Date

## **Section 1: Responsibility to Maintain a Safe Workplace**

Program Administrator, **Joshua Sahagun**, has the authority and responsibility for implementing the program. Our Program Administrator will assist with safety training, accident investigation, maintaining safety records and reporting a serious injury to the proper authorities as soon as possible, but within eight hours.

**Managers are responsible for developing company policies and practices to enhance safety; and conducting periodic safety inspections to maintain an effective program. Staffing Managers and Client Supervisors will maintain a productive safe workplace, and ensure the following:**

- Employees are trained to recognize hazard.
- Employees use and maintenance of protective equipment in safe condition.
- New employees are monitored during the first 14 days of work.
- A Task Hazard Process is performed for each task.
- Safe Work Practices are followed.
- Safety expectations are communicated.
- Equipment and tools are inspected before use.
- Accidents, injuries and close calls are investigated.
- Telephone numbers for emergency services in the area are readily available to employees.
- Exceptional safety performance is recognized and recorded.
- Emergency medical responses are expedited.

**Employees must comply with the following requirements and avoid taking short cuts:**

- Safety provisions and practices in the program and all company Safe Work Practices.
- Immediately report unsafe conditions, actions, close calls, and/or property damage to a Supervisor.
- Use Personal Protective Equipment (PPE) and other safety devices in accordance with the manufacturer's instructions when directed by a Supervisor or required by Safe Work Practices.
- Alert a Supervisor/Lead if you require training on how to properly use protective devices, specialized tools or mobile equipment.

## **Section 2: Communicating Safety Expectations**

Open two-way communication between leadership and employees about safety and health issues or concerns is important in establishing a safe and productive workplace. Training is provided to Supervision and employees to communicate our safety expectations. In this way, employees are able to recognize and report unsafe conditions to a Supervisor without fear of reprisal.

New employee orientation will include a discussion of safety and health policies and procedures. Further, this IIP Program description will be distributed to employees on an annual basis along with the Company's Employee Handbook.

In addition, all managers are responsible for communicating with their subordinates about occupational safety and health in a form readily understandable by all employees. We also encourage all employee to inform their managers about workplace hazards without fear of reprisal. Employees who believe a workplace hazard exists must promptly inform IIPP Administrator of such hazard. Employees may report the hazard without fear of retaliation or reprisal. Anonymous reports will also be accepted by the IIPP Administrator.

**Safety communications are a daily occurrence, and may include:**

- Daily pro-task safety meetings.
- Providing new employees with a Safety Orientation before starting work.
- Encouraging safety questions or comments during training, general meetings, tailgate meetings, and periodic safety checks.
- Expecting Supervisors to provide knowledgeable answers.
- Posting and distributing written safety information, safety alerts, articles about recent industry accidents, and new/revised Safe Work Practices.
- Developing Safe Work Practices with employees' input.
- Recognize exceptional safety performance.
- A system for employees to anonymously inform management about workplace hazards

### Section 3: Hazard Assessment and Correction

Finding out and correcting hazards are core safety actions. The Supervisor or a qualified person will, at the start of each workday, or before starting work at a new location or a new task, perform a Task Hazard Process.

**The process should take about 20 minutes and requires the Supervisor or qualified person to take the following actions:**

- Assess the immediate work area where the task will be performed to identify any existing hazards and needed protective actions.
- Identify the steps needed to perform the task, potential hazards associated with each step, and safe work practices.
- Conduct a pre-task safety meeting with the crew to discuss the identified hazards, any immediate protective actions, and safe work practices. Correct the identified hazards before starting a task.
- Encourage crewmembers to participate and always focus on safety.

If a corrective action exceeds a simple, immediate fix, develop interim protective measures. Inform and train the crew on any interim protective measures. Supervision will conduct periodic unannounced safety inspections to ensure all hazards have been identified and corrected, employees are trained and using PPE if required and assess overall safety performance. These inspections will be documented, and include the date, time, location, and person conducting the inspection.

#### Responding to an Imminent Hazard

Immediately alert your supervisor of an **IMMINENT HAZARD**. **DO NOT ENTER** an area or zone where an **IMMINENT HAZARD** is present without proper training and protective measures.

Employees who are properly trained and provided with necessary safeguards should enter the area.

Supervisors are responsible for ensuring all exposed employees are removed from the area where an **IMMINENT HAZARD** exists and cannot be immediately abated in a safe manner. When possible, the area surrounding the hazard will be secured to reduce exposure to others.

## Section 4: Training

Safety training is a learning opportunity and reinforces the importance of following Safe Work Practices and the safe use of **Personal Protective Equipment (PPE)**. Employees are not permitted to start any new assignments without first having received all training.

### New Employee Safety Orientation

**Safety orientation is mandatory before allowing new employees to begin work. New employees should understand the following:**

- Importance of following all the provisions provided by the employer and company Work Safe Practices.
- Safety rules are strictly enforced and the consequences for not complying with them.
- Recognition of the warning signs/symptoms of Heat Illness, specific means to access shade, importance of taking rest breaks, location of potable water, and what to do in an emergency. During heat waves, new employees will work the first 14 days in a "buddy system" with an experienced employee to safely adjust to working conditions.
- General awareness of HAZCOM and the location of Safety Data Sheets (SDSs) (formerly MSDSs.)
- Importance of reporting unsafe conditions and actions to a Supervisor and how to report anonymously.

Luttrell Staffing Group Staff and Client Supervisors' will attend periodic training to improve their skills in hazards recognitions and accident investigation.

### HAZARD COMMUNICATION (HAZCOM)

**HAZCOM** creates an awareness of the potential dangers for coming in contact with hazardous materials. **Safety Data Sheets (SDSs)** provide important information about chemical properties, hazards and protective measures. **SDSs** are used to identify proper handling precautions, required **PPE**, methods for safe disposal and emergency medical actions. **SDSs** are available for review at the "**Right to Know**" station at our Client Facility. Review the **Global Harmonization Systems (GHS)** diagram to identify the different classes of hazardous materials.

## Section 5: Complying with Safety Program Provisions

Exceptional safety performance will be recognized by Client Supervision and Luttrell Staffing Group Staff members. Failure to comply with all company Safe Work Practices and provisions will be recorded and result in progressive disciplinary action. Supervisors are expected to enforce Safe Work Practices fairly and uniformly. All disciplinary actions represent the consequences for not complying with Safe Work Practices, or for not correcting unsafe conditions or actions in a timely manner.

- A. Level 1 event is general in nature (i.e., likely injury would not be serious, recordable or reportable). The infraction may be observed, unobserved, or represent a failure to follow Safe Work Practices. At Level 1 the Supervisor will give a verbal and a written warning to the employee. Corrective action(s) must be identified and the employee must acknowledge the deficiencies in writing. Consequences may include retraining and/or temporary reassignment.
- B. Level 2 event is serious in nature (i.e., likely injury would be serious, recordable, reportable, and/or require hospitalization). The infraction may be observed, unobserved or represent a failure to follow Safe Work Practices. Level 2 actions require a formal investigation. Level 2 actions represent a failure in the safety system and requires a written warning with potential suspension. Level 2 actions require review subsequent to final actions.
- C. Level 3 event involves exposure to an IMMEDIATE HAZARD (reasonably expected to cause death/serious physical harm immediately). If the formal investigation confirms an infraction, disciplinary action may include termination.



## **Section 6: Accident investigation**

Client Supervisors and Luttrell Staffing Group Staff members are responsible for investigating accidents and preparing a preliminary accident report. The Accident Investigation report will identify the root cause(s) of the accident and recommend preventative and/or corrective actions to be implemented. The Program Administrator may provide administrative support. Witnesses are expected to provide written statements. Investigation of close calls will be on a case-by-case basis.

Procedures for investigating workplace accidents and hazardous substance exposures include:

1. Visiting the accident scene as soon as possible;
2. Interviewing injured employees and witnesses;
3. Examining the workplace for factors associated with the accident/exposure;
4. Determining the cause of the accident/exposure;
5. Taking corrective action to prevent the accident/exposure from reoccurring;
6. Recording the findings and corrective actions taken.

### **First Aid and Emergency Medical Response**

- Secure the area immediately around the injured person.
- Safeguard Emergency Responders.
- Supervisors will ensure the Emergency Response Protocols are followed and the injured person receives prompt medical care.
- Ensure qualified person(s) are available to administer CPR/First Aid.
- Interview witnesses as soon as possible. When appropriate, obtain witnesses' name, telephone number and verbal statements.
- Take photographs and physical measurements, if safe to do so.
- Focus on identifying the root cause(s) of the accident.
- After obtaining all the facts surrounding the event, prepare a preliminary written accident investigation report.
- Recommended preventative and/or corrective actions to be taken.

## **Section 7: Recordkeeping**

The following information is retained and used to improve the performance of our Program:

- Safety and Health Inspections
- Accident investigations
- New Employee Orientations
- Certificates and Licenses
- Positive Recognition
- Safety Warnings
- Regulatory Actions

Safety training records must show:

- Trainee's Name
- Training Date(s)
- Type of Training
- Training Provider(s)

## Section 8: Code of Safe Practices

1. Think before you act! Protect yourself and others.
2. Routinely inspect equipment, tools and workstations. If unsafe, notify a Supervisor.
3. Report unsafe conditions/actions to your Supervisor.
4. Possession/use/distribution of alcohol/unauthorized drugs is prohibited.
5. When required, use **Personal Protective Equipment (PPEs)**.
6. Do not block emergency rescue equipment, exits or access.
7. Do not operate mobile machinery/equipment without training and or/authorization.
8. Riders are not permitted on mobile construction equipment.
9. Horseplay, scuffling, and other inappropriate actions are prohibited.
10. Notify a Supervisor if you have not received training.
11. **DO NOT TAKE SHORT CUTS.** Prevent an injury!
12. Ensure safety devices are in place and functioning.
13. Do not throw or drop material from elevated locations until proper precautions are taken to protect others from falling objects.
14. All the employees will attend New Hire Orientation and Safety Training prior to starting work.
15. Report all work-related injuries or signs/symptoms of illness to a Supervisor.



## **HEAT ILLNESS PREVENTION PLAN**

## Heat Illness Prevention Plan

**Purpose:** Provide a safe working environment and protect employees who are exposed to temperature extremes, radiant heat, humidity, or limited air movement while working outdoors.

**Plan:** Employees working outdoors will be trained to recognize and prevent heat related illnesses and actions to take if symptoms are present. Supervisors will check weather forecasts several days in advance and evaluate working conditions to determine if employees will be at risk from heat related illnesses. Additional precautions will be taken during heat waves. Evaluation of heat conditions involves a combination of risk factors such as temperature extremes, radiant heat, humidity, limited air movement, protective clothing, workload severity, and duration.

**Training:** Heat Illness Prevention Training is mandatory for all employees prior to working outdoors. Training will reinforce our current Safe Work Practices (i.e., provisions for drinking water, **CPR/First Aid** readiness and emergency response), and recognition of warning signs and symptoms. **Heat Illness Prevention** training will address the following:

- Recognition of environmental and personal risk factors. Best means or methods to control risk factors
- Importance of frequently drinking water to prevent heat illness.
- Maintain water supplies in a sanitary condition.
- Importance of acclimatizing new and/or returning employees.
- Early warning signs/symptoms of heat illness.
- Importance of immediately reporting signs/symptoms to a Supervisor.
- Roles and responsibilities to initiate a medical emergency response.
- Importance of CPR/First Aid readiness at each worksite.
- Means/methods used to contact 911 and provide emergency responders with directions to the site.

Client Supervisors or Emergency Responders will receive additional training to:

1. Establish and maintain CPR/First Aid competency.
2. Answer employees' questions concerning heat illness prevention.
3. Evaluate working conditions, and when possible, schedule tasks and activities to reduce exposure to heat related risk factors.
4. Ensure employee can recognize warning signs/symptoms of heat illness.

5. Watch for those who exhibit early warning signs/symptoms.
6. Initiate an emergency response.

## **Procedures for the Provision of Water**

Adequate supplies of fresh, pure and suitably cool potable drinking water will be provided to our employees free of charge at all times. Company potable water containers and/or retail bottled water (sealed one-time use) will be maintained in a sanitary manner. Disposable single serving drinking cups are provided for use with company potable water containers. Potable water containers are to be filled directly from potable water sources at the start of each day. Water supplies are to be maintained at safe levels throughout the day, keeping a minimum of at least 1-quart of water per person available at all times. Water supplies will be replenished and resupplied as needed to meet these provisions and encourage frequent use. As the work progresses, keep access to water supplies convenient and keep employees aware of these new locations.

## **Procedures for the Provision of Shade**

It is important to prevent the body from overheating. Resting in shade allows the body to cool down. Shade shall be present when the temperature exceeds 95 degrees Fahrenheit. The availability of shade with cool and suitable potable water to drink must be identified and shared with the crew at the beginning of the shift in a crew safety meeting (tailgate). Encourage all crewmembers to take rest breaks in the shade. Employees that are taking a cool down rest period must be monitored by a Supervisor. To be effective, shade must be open to air movement, or have mechanical ventilation, or water misting. The amount of shade must be able to cover every employee. Shade may be any natural or artificial means that is safe. The interior of a vehicle may not be used to provide shade unless the vehicle's air conditioner is operating. Do not rest underneath mobile equipment or any area that requires crouching. Crew size and site conditions may require additional shade structures. The Supervisor will make this determination considering all safety factors, including the use of approved alternative protective measures.

## **High Heat Procedures**

Effective requirements regarding the observation/monitoring of employees for alertness and signs and symptoms of heat illness include designating an employee as authorized to contact emergency services when necessary. Pre-shift meetings are required before the start of work to review high heat procedures, remind employees to drink water and remind employees to take cool down rests when necessary **(High Heat Procedures come into effect at 95 Degrees Fahrenheit.)**

## **Acclimatization Methods and Procedures**

New employees are required to have **Heat Illness Prevention** training before starting work. Others returning to work after extended periods of time off must receive refresher **Heat Illness Prevention** training before starting back to work. New employees and others returning to work will be monitored during the first 14 working days. Environmental and personal risk factors should be considered when assigning tasks to the individuals. It will take time for their bodies to adapt to new physical stresses and heat overloading due to high temperatures, working in direct sunlight, physical conditions, and strenuous work activities. During heat waves, Supervisors must be vigilant and monitor them for 14 working days until they have fully adapted to the pace and conditions of work. The "buddy system" may be used in these instances.

## **Emergency Response Procedures**

For every 20 employees a Supervisor/Qualified person must be **CPR/First Aid Certified**. At least one such qualified person will be available to the crew at every worksite to render First Aid. This person will help determine the appropriate response for someone experiencing symptoms of heat illness. Appropriate responses may include drinking more water and taking a longer rest break to calling for emergency medical response. If, for any reason, a qualified person is not available and an employee is showing symptoms of possible heat illness, call for emergency medical services.

If the temperature is predicted to reach 95 Degrees Fahrenheit or higher, then a qualified person will remind the crew of emergency response protocols at the daily pre-task safety meeting (tailgate). Any changes to the emergency medical response for a worksite will be discussed at the daily pre-task safety meeting. The Supervisor will ensure all parties are properly equipped to carry out these responsibilities.